

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ANAS ELHADY, et al.,)	
)	Case No. 16-cv-00375
Plaintiffs,)	Hon. Anthony J. Trenga
)	
v.)	
)	
CHARLES H. KABLE, Director of the)	
Terrorist Screening Center; in his official)	
capacity, et al.;)	
)	
Defendants.)	

PLAINTIFFS' SECOND MOTION TO COMPEL

Pursuant to Fed R. Civ. P 37(a)(3)(B) and E.D. Va. L.R. 37, Plaintiffs hereby move to compel information in response to certain questions from the four recent 30(b)(6) depositions of Defendants. During the 30(b)(6) depositions of official capacity Defendants Terrorist Screening Center ("TSC"), Transportation Security Administration ("TSA"), Customs and Border Protection ("CPB"), and Federal Bureau of Investigation ("FBI"), the designated representatives were either unable to answer or instructed not to answer responsive questions. The questions pertain to Defendants' inclusion standards for the TSDB, the scope of the Defendants' dissemination of the TSDB, annotations and standing screening procedures related to the use of the TSDB, and aggregate statistics related to the effectiveness of the TSDB. Accordingly, Plaintiffs request the Court order the Defendants to provide this information.

Pursuant to Federal Rule of Civil Procedure 26(c)(1), Plaintiffs' counsel certifies the parties have met and conferred in good faith, but have not been able to reach agreement as to the requested information. They continue to discuss a variety of different discovery

matters and will continue to work to resolve as many as possible prior to the hearing; however, based on conversations with Defendants' counsel, most of the issues briefed below are expected to remain unresolved.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

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**Gadeir Abbas is licensed in VA, not in D.C.
Practice limited to federal matters.*

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Dated: April 13, 2018

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2018, I electronically filed the foregoing by using the Court's ECF system. I further certify that all participants in the case are registered ECF users and will be electronically served by the Court's ECF notification system.

Respectfully submitted,

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